

# Exhibit 6

**Mangi, Adeel A. (x2563)**

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**From:** Mangi, Adeel A. (x2563)  
**Sent:** Friday, January 20, 2006 4:01 PM  
**To:** 'Mark Sandmann'  
**Subject:** RE: Oxford-AWP Litigation

Mark: From our correspondence in December we understood Oxford was in the process of making productions and awaited your letter regarding any outstanding queries or concerns. We have received neither production nor a letter from you. Please let me know when you are available early next week to discuss. It is now imperative that production be completed promptly and depositions scheduled.

Thanks  
Adeel

-----Original Message-----

From: Mark Sandmann [mailto:MMS@rawlingsandassociates.com]  
Sent: Thursday, December 01, 2005 5:32 PM  
To: Mangi, Adeel A. (x2563)  
Subject: Oxford-AWP

Adeel:

I had the call with Oxford today and we discussed each of the items listed. I am going to put our response in a letter to you and, based on your response to our response we can set a date for what needs to be produced. I will be more specific in my letter, whcih will likely go out tomorrow or Monday, but some of the requests have to be more specific because, quite frankly, Oxford is not sure what exactly it is you are looking for in several of the requests.

Oxford does want to work with you to resolve these outstanding issues and I now have an attorney dedicated to work with me on these issues-which is good news.

As far as the data goes, It looks we actually did send everything. I am going to look at the disks Oxford sent me, there are 5 total which contain Rx and Medical claims data on the J-codes provided, as well as an excel formatted document containing "variable definitions". Like I said, you should have 5 CDs that contain Oxford data. If you do not, please let me know.

Finally, with respect to the data I was told that there should be an indicator in the data that can be used to derive the payment methodologies. I am going to check that. If there is, I will let you know what to look for. If not, Oxford will resubmit the data wiuth said indicator.

Again, my letter will be more specific, but I just wanted to give you a quick status update and query you about the CDs previously provided.

Take care.

Mark M. Sandmann  
502.814.2157

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# **Exhibit 7**

**Mangi, Adeel A. (x2563)**

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**From:** Mark Sandmann [MMS@rawlingsandassociates.com]  
**Sent:** Monday, February 13, 2006 9:42 AM  
**To:** Mangi, Adeel A. (x2563)  
**Subject:** RE: Oxford

That is fine. I am in the office the remainder of the month and will work with Oxford. Thank you, once again, for your patience in this matter

Mark M. Sandmann  
502.814.2157

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>>> "Mangi, Adeel A. (x2563)" <AAMANGI@PBWT.COM> 02/13/06 09:24AM >>>  
Thank you Mark. We look forward to receiving the supplemental productions we have requested from Oxford by the end of the month and will schedule the deposition shortly thereafter. Please be advised that due to the summary judgment schedule that time frame is inflexible and we are relying on your representation that production will be completed by that time.

Best regards  
Adeel

-----Original Message-----

From: Mark Sandmann [mailto:MMS@rawlingsandassociates.com]  
Sent: Monday, February 13, 2006 9:04 AM  
To: Mangi, Adeel A. (x2563)  
Subject: Re: Oxford

Adeel:  
Apologies. I have been out of the office for most of this month. I will follow up with Oxford and we will have data and the additional responses we discussed to you before the end of the month. I will see where Oxford is on getting this.  
Thanks and take care

Mark M. Sandmann  
502.814.2157

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>>> "Mangi, Adeel A. (x2563)" <AAMANGI@PBWT.COM> 02/10/06 06:32PM >>>

Mark: It has now been almost 3 weeks since our call of the 24th. During that call, we had worked through all outstanding issues. My understanding was you would talk to your client and get production rolling and let us know of any outstanding issues. I emphasized that the one situation we could not accept was a repeat of the past pattern, where we would receive a production assurance and then nothing would happen for weeks. You assured me this would not happen again. But we are yet to see any documents or hear back from you. I have now been instructed by the defense group to file a motion to compel next week. Based on our discussion, I hope that can still be avoided. If there is a firm production timetable please provide that to me. If not, I trust we can agree meet and confer obligations have been satisfied.

Best regards

Adeel Abdullah Mangi  
Patterson, Belknap, Webb & Tyler LLP  
1133 Avenue of the Americas  
New York, NY 10036  
Ph: (212) 336 2563  
Fax: (212) 336 7947  
aamangi@pbwt.com

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# Exhibit 8

**Mangi, Adeel A. (x2563)**

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**From:** Mangi, Adeel A. (x2563)  
**Sent:** Tuesday, January 24, 2006 5:02 PM  
**To:** Mark Sandmann  
**Subject:** Oxford claims data

Mark: Per our discussion, here is a list of the questions we need to resolve regarding the data produced to date by Oxford:

- (1) The data documentation provided to date does not include decode descriptions for the following values of the *placecod* field (i.e. the place of service field): 1, 2, 9. Please produce that information.
- (2) Do claims paid on a capitated or DRG basis appear in the data, and if so, how these claims can be identified?
- (3) How can claims paid based on billed charge can be identified in the claim data?
- (4) Were the provider specialty field (e.g., oncology, general practice, hematology) and the denial code field included? We are unable to locate them. They were requested and Oxford produced decode information for the denial code field, however this field does not appear in the claim data it produced.

As discussed, the other two overarching issues regarding claims data are (A) production of data for services incident to drug administration; (B) production of drug and service data for 3/04 to present. I suggest Oxford produce a listing of available fields before doing these supplemental pulls so we can ensure all necessary fields are captured and so we do not have a repeat of the types of issues discussed above.

Please call me to discuss when you have spoken to your client.

Best regards

Adeel

3/13/2006



# Exhibit 9

**Mangi, Adeel A. (x2563)**

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**From:** Mark Sandmann [MMS@rawlingsandassociates.com]  
**Sent:** Wednesday, March 01, 2006 11:30 AM  
**To:** Mangi, Adeel A. (x2563)  
**Subject:** Re: Oxford

I have

Mark M. Sandmann  
502.814.2157

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>>> "Mangi, Adeel A. (x2563)" <AAMANGI@PBWT.COM> 03/01/06 11:27AM >>>  
Thank you for letting me know Mark. Please advise Oxford that we will be filing a motion to compel shortly seeking costs and fees.

-----Original Message-----

From: Mark Sandmann <MMS@rawlingsandassociates.com>  
To: Mangi, Adeel A. (x2563) <AAMANGI@PBWT.COM>  
Sent: Wed Mar 01 09:35:44 2006  
Subject: Oxford

Adeel:

I have not received anything from Oxford. Do what you must. I tried.

Mark M. Sandmann  
502.814.2157

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# Exhibit 10

**Mangi, Adeel A. (x2563)**

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**From:** Mark Sandmann [MMS@rawlingsandassociates.com]  
**Sent:** Wednesday, March 01, 2006 11:33 AM  
**To:** Mangi, Adeel A. (x2563)  
**Subject:** Re: Oxford

If you could--send a draft electronically before filing--I do not know to what extent they have attempted to provide the information, data, etc. and maybe that will get their attention and at least let me know what, if anything, they have done. Heck, they may be close to getting it all together as far as I know--I am just not getting responses back

Mark M. Sandmann  
502.814.2157

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Mark M. Sandmann  
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